

This is the 1<sup>st</sup> affidavit  
of M Stody in this case  
and was made on November 23, 2023  
Court File No.: E212762  
Court Registry: Vancouver



Claimant: Alison Rose Nagase

Respondent: Daniel Yoshio Nagase

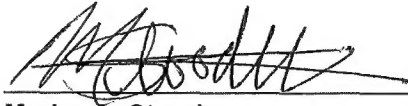
### AFFIDAVIT

I, Marianne Stody, c/o 1500 – 401 West Georgia Street, Vancouver, BC, Paralegal, AFFIRM THAT:

1. I am a Paralegal with the law firm of Lindsay Kenney LLP, solicitors for the Claimant herein and as such have personal knowledge of the facts and matters hereinafter deposed to except where stated to be based on information and belief and where so stated I verily believe the same to be true.
2. Counsel for the claimant commenced the within action on November 10, 2021 and successfully obtain a protection order wherein the Respondent was prohibited from communicating, following or nearing within 500 meters of the Claimant or the Children.
3. **Now produced and shown to me and marked as Exhibit A** to this Affidavit is a CBC article about the Respondent dated October 1, 2022 entitled "Doctor Who Gave Anti-Vaccine Speech in front of Effigies of Officials Being hanged faced Discipline Hearing."
4. **Now produced and shown to me and marked as Exhibit B** to this Affidavit is BC College of Physicians and Surgeons citation regarding the Respondent.
5. **Now produced and shown to me and marked as Exhibit C** to this Affidavit is a CBC article about the Respondent entitled "\$66.6M Lawsuit Filed by Anti-Vaccine Activist Thrown out of Court."
6. **Now produced and shown to me and marked as Exhibit D** to this Affidavit is a copy of a letter sent by counsel for the Claimant to the Respondent dated September 5, 2023, advising that the "memos" written by the Respondent in his support and spousal cheques to the Claimant, as outlined in the Claimant's affidavit #2, were not legally binding. The letter also advised the Claimant would be seeking action via FMEP for outstanding spousal support in the amount of \$4,600.00.
7. **Now produced and shown to me and marked as Exhibit E** to this Affidavit is a copy of an email dated September 26, 2023 to office of counsel for the Claimant wherein the Respondent advises "My bill to you will follow."

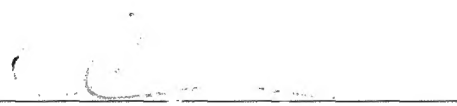
8. **Now produced and shown to me and marked as Exhibit F** to this Affidavit is a copy of an invoice dated April 17, 2023 addressed to the office of counsel for the Claimant, and counsel for the Claimant, totaling \$132,000,000.00 for "wrong of hearsay and defamation resulting in unwarranted court order."

SWORN (OR AFFIRMED) BEFORE ME at )  
 Vancouver, British Columbia, )  
 On November 23, 2023 )  
 \_\_\_\_\_ )  
 A commissioner for taking )  
 affidavits for British Columbia )

  
 \_\_\_\_\_  
**Marianne Stody**

**FANDA WU**  
*Barrister & Solicitor*  
**LINDSAY KENNEY LLP**  
 1500 - 401 WEST GEORGIA STREET  
 VANCOUVER, B.C. V6B 5A1  
 TEL: 604-687-1323

This is **Exhibit A** referred to in the Affidavit #1 of  
M Stody sworn before me at Vancouver,  
British Columbia this 24<sup>th</sup> day of November, 2023

  
A Commissioner for taking Affidavits for  
British Columbia

## Doctor who gave anti-vaccine speech in front of effigies of officials being hanged faces discipline hearing

Dr. Daniel Nagase also spread false claims about COVID-19 vaccine causing stillbirths at B.C. hospital

Bethany Lindsay · CBC News · Posted: Oct 01, 2022 1:48 PM PDT | Last Updated: October 1, 2022



Daniel Nagase spoke against COVID-19 vaccines and in favour of the anti-parasitic drug ivermectin during a speech at the B.C. Legislature in Victoria on Dec. 9, 2021. (Screengrab/Bitchute)

A doctor who spread false rumours about vaccines causing stillbirths at a Vancouver-area hospital and made other misleading claims about COVID-19 while standing in front of effigies portraying B.C. politicians being hanged will face a disciplinary hearing with his regulatory college.

The College of Physicians and Surgeons of B.C. posted a notice on Thursday announcing that a citation has been issued alleging misconduct by family physician Dr. Daniel Nagase.

Nagase, who has resigned his licence to practise in B.C., is accused of violating professional standards by "making public addresses regarding the COVID-19 pandemic and related issues

that included his making misleading, incorrect, or inflammatory statements about vaccinations, treatments and measures for COVID-19," the public notice says.

That includes falsely stating, in public, that the vaccines are dangerous, publicly suggesting that the anti-parasitic drug ivermectin is a safe and effective treatment for the virus, and "making at least some of these public statements while appearing in front of effigies of political figures who were [hanged] from nooses."

- **False claims of stillbirths among vaccinated mothers at B.C. hospital slammed as harmful disinformation**

The latter incident was caught on camera on Dec. 9, 2021, when Nagase spoke outside the B.C. Legislature while dummies labelled as Premier John Horgan, Health Minister Adrian Dix and Public Safety Minister Mike Farnworth were raised behind him, with ropes tied around their necks.

During that speech, he falsely claimed that COVID-19 vaccines are "the most dangerous injection in the history of vaccination."

Dr. Charles Hoffe of Lytton, B.C., also spoke at the event, and is set to face his own disciplinary hearing with the college.

Just a couple of weeks before that speech, Nagase was filmed participating in an anti-vaccine protest outside the North Vancouver RCMP detachment.

He was shown repeating disinformation suggesting there were more than a dozen stillbirths in 24 hours at Lions Gate Hospital among mothers who had received the COVID-19 vaccine.

That lie spread so widely that hospital operator Vancouver Coastal Health was forced to issue a statement making it clear that there was no truth to the rumours.

The health authority also clarified that Nagase has no connection to Lions Gate, and no hospital privileges anywhere in the region.

**Doctor also faced discipline in Alberta**

Nagase's claims about COVID-19 previously attracted attention in Alberta, where he has spent recent years working in rural hospitals.

Last fall, Alberta Health Services issued a warning about Nagase's public claims of using ivermectin to cure COVID-19 in elderly patients, stating that neither the veterinary nor human versions of the drug have been proven safe or effective treatments for the virus.

Nagase's medical licence has been cancelled in Alberta for non-renewal and non-payment of fees, and there's a notice next to his name in the College of Physicians of Alberta registry saying he's forbidden from writing mask or vaccine exemption letters, prescribing ivermectin or from treating any COVID-19 patients.


- **2 B.C. doctors linked to website selling bogus mask and vaccine exemption 'certificates'**
- **2 B.C. doctors went on a COVID-19 speaking tour. Colleagues say their misinformation put public at risk**

Nagase is the third doctor that the B.C. college has publicly acknowledged investigating for spreading misinformation about COVID-19 and vaccines. Though disciplinary hearings have been announced for both Nagase and Hoffe, dates have yet to be scheduled for those proceedings.

Dr. Stephen Malthouse of Denman Island remains under investigation, but the college announced in March that it was suspending his licence to protect the public while that process is underway.

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This is **Exhibit B** referred to in the Affidavit #1 of  
M Stoody sworn before me at Vancouver,  
British Columbia this 24<sup>th</sup> day of November, 2023



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A Commissioner for taking Affidavits for  
British Columbia

# Citation re: Dr. Daniel Yoshio Nagase

A citation has been issued for Dr. Daniel Yoshio Nagase, a family physician and former registrant of the College.

A Discipline Committee Panel will be appointed to conduct a hearing to inquire into Dr. Nagase's alleged misconduct, namely that, on or about December 9, 2021, while a registrant, Dr. Nagase contravened standards imposed under the *Health Professions Act*, including but not limited to the Canadian Medical Association's *Code of Ethics and Professionalism*, by making public addresses regarding the COVID-19 pandemic and related issues that included his making misleading, incorrect, or inflammatory statements about vaccinations, treatments, and measures for COVID-19, including

- publicly expressing that Ivermectin is a safe and effective treatment for COVID-19;
- publicly expressing that the COVID-19 vaccinations are dangerous, or making otherwise misleading, incorrect, or inflammatory statements; and
- making at least some of these public statements while appearing in front of effigies of political figures who were hung from nooses.

The hearing date will be posted on the [College website](#) when it has been scheduled.

This is **Exhibit C** referred to in the Affidavit #1 of  
M Stody sworn before me at Vancouver,  
British Columbia this 24<sup>th</sup> day of November, 2023

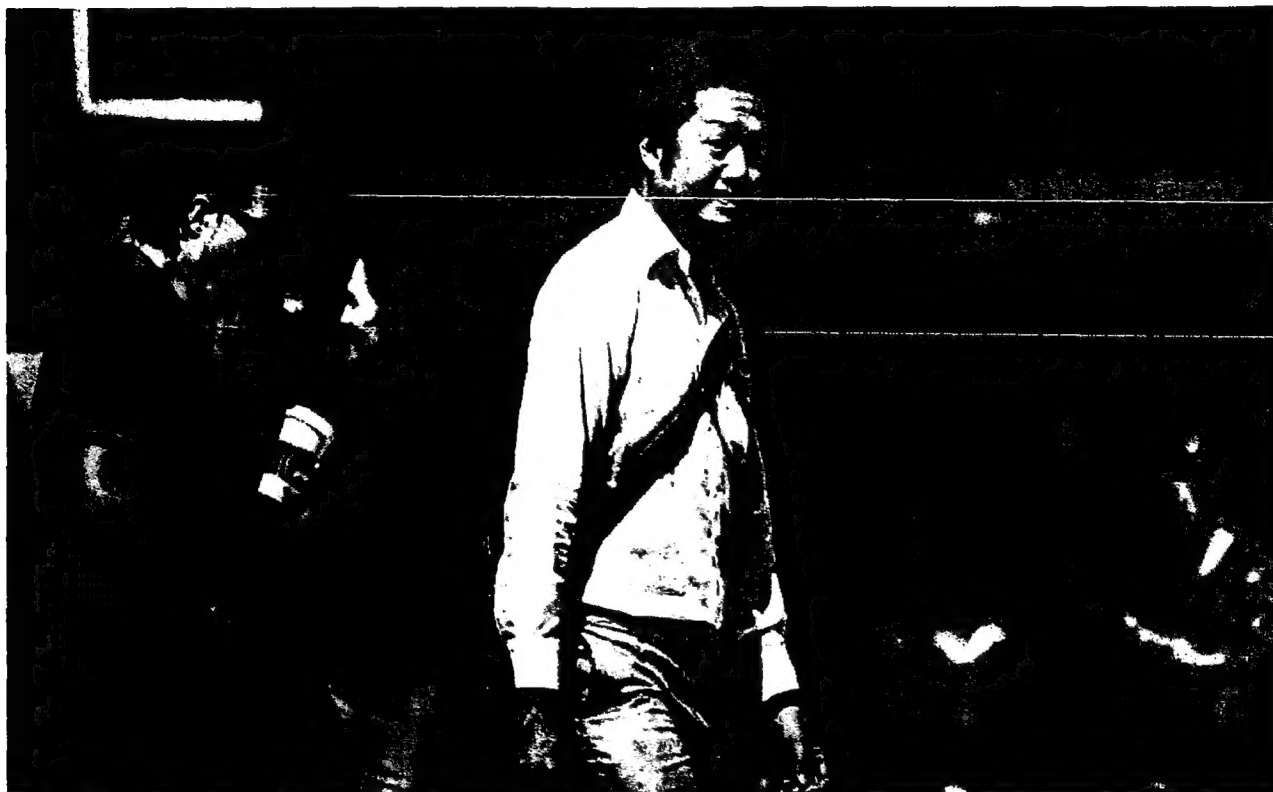


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# \$66.6M lawsuit filed by anti-vaccine activist thrown out of court

Lawsuit filed by former family doctor Daniel Nagase ruled to be frivolous, vexatious and an abuse of process



Daniel Nagase outside the B.C. Supreme Court in Vancouver. (Ben Nelms/CBC)

A \$66.6 million lawsuit filed by anti-vaccine activist Daniel Nagase was thrown out of B.C. Supreme Court in Vancouver Friday amid strange antics from Nagase, a former family doctor.

In delivering his ruling, Justice Michael Tammen said Nagase's claim was frivolous, vexatious and an abuse of process.

Nagase, who represented himself and made nonsensical pseudo-legal arguments, was not in the courtroom when the decision was read.

At the start of the hearing, he stood in the hallway and tried to address the judge by speaking loudly through an open door, despite a plexiglass barrier and about 15 metres separating the two.

He eventually entered the court and made brief comments when it was his turn to speak, but only after Tammen advised him of the process.

"This notion of participating for certain purposes and making speeches and going in and out of the court simply is not known in our courts," said Tamman. "So you've got to make a decision whether you're going to participate or not."

- **Pseudolegal 'expert' banned from acting as a lawyer in B.C. courtrooms**

Over a dozen Nagase supporters attended the hearing, at times expressing their displeasure from within the separated and glassed-in gallery of Courtroom 20, which was built to hold the Air India trial.

The \$66.6 million claim accused B.C. Supreme Court Master Grant Taylor of violating, among other things, Nagase's "right of protection and preservation of the vessels of my bloodline [and] ... the vessels of the souls of my children."

The amended version suggested Taylor was responsible for Nagase's children being vaccinated against COVID-19 because it was Taylor who wrote an order barring Nagase from contacting either child between November 2021 and November 2022, during which time they presumably received their shots.



Daniel Nagase spoke against COVID-19 vaccines and in favour of the anti-parasitic drug ivermectin during a speech at the B.C. Legislature in Victoria on Dec. 9, 2021. (Screengrab/Bitchute)

The claim said the children "have been subject to future harm enabled by wrongful orders" and asked for \$33.3 million in damages for each child, plus future medical expenses, to be paid jointly by Taylor and the B.C. Supreme Court, which was also named as a defendant.

Crown attorney Michael Kleisinger brought the application to have the lawsuit struck on behalf of the B.C. attorney general. Nagase was also ordered to pay costs of \$1,108.08.

Nagase is a family physician who no longer holds a medical licence and was the subject of a public warning related to his scientifically unsupported statements about COVID-19.

- **Anti-vaccine doctor's fans flood court, claiming to be 'common-law grand jury' in his \$66.6M lawsuit**

Over the last three years, Nagase has risen to prominence for his public agitation against measures related to COVID-19.

He has frequently repeated false and misleading information about vaccines, spreading untrue rumours of a spike in stillbirths at Lions Gate Hospital caused by the shot and giving an anti-vaccine speech in front of hanged effigies of B.C. politicians at the legislature in Victoria.

He has resigned his licence to practise medicine in this province but still faces a disciplinary hearing with the College of Physicians and Surgeons of B.C. for misconduct related to what the college describes as his "misleading, incorrect, or inflammatory statements about vaccinations, treatments and measures for COVID-19."

- **Doctor who gave anti-vaccine speech in front of effigies of officials being hanged faces discipline hearing**
- **Bizarre legal theory making anti-vaccine movement more extreme, experts warn**

In Alberta, where he has also worked, his registration has been cancelled for non-renewal and non-payment of fees. The College of Physicians of Alberta has also issued a notice saying he's forbidden from writing mask or vaccine exemption letters, prescribing the anti-parasitic medication ivermectin or treating any COVID-19 patients.

In October 2021, Alberta Health Services issued a warning about Nagase's public claims of using ivermectin to cure COVID-19 in elderly patients, stating that neither the veterinary nor human versions of the drug have been proven safe or effective treatments for the virus.

This is **Exhibit D** referred to in the Affidavit #1 of  
M Stody sworn before me at Vancouver,  
British Columbia this 24<sup>th</sup> day of November, 2023



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A Commissioner for taking Affidavits for  
British Columbia

☒ Vancouver Office  
1800, 401 West Georgia Street  
Vancouver, BC Canada V6B 5A1  
T 604.687.1323  
F 604.687.2347

☐ Langley Office  
400, 8621 - 201 Street  
Langley, BC Canada V2Y 0G9  
T 604.888.5811  
F 604.888.6565



OUR FILE: 20183115

REPLY TO: Fanda Wu  
Lawyer  
EMAIL: fwu@lklaw.ca  
DIRECT: 604.235.3950

September 5, 2023

**VIA E-MAIL:** [dnagase@protonmail.com](mailto:dnagase@protonmail.com))

Dear Mr. Daniel Nagase:

**Re: Nagase v. Nagase  
BCSC Action No. E212762, Vancouver Registry**

We understand that you have been sending our client her child and spousal support cheques with handwritten notes in the memo portion of the cheque. In July of 2023, your spousal support cheque, a picture of which is **enclosed**, included a memo stating "Adult Child Support. cashing this cheque settles all future debts by agreement". Your August 2023 child support cheque, a picture of which is **enclosed**, includes a memo stating "cashing of this child support cheque returns guardianship fully to the most qualified parent".

None of these "memos" in your support cheques, or any other document, are legally binding on our client. Further, your use of these support cheques to communicate odious messages to our client is a form of harassment and will not be tolerated. Should you continue to do the same, our client will not hesitate to seek orders against you, including no contact orders and protection orders, without further notice to you.


Future child and spousal support cheques must not have any notes or memos included. Additionally, using your mother as a conduit to drop off the support cheques at our client's workplace, where your mother then communicates further harassing messages from you, is also not acceptable. Our client also does not agree to you or anyone on your behalf showing up at her home or workplace to drop off cheques. Future support payments should be made via FMEP. Do not directly or indirectly contact our client through any means.

You have also failed to pay spousal support of \$4,600 per month since August of 2023 and are in arrears of \$9,200. Our client will be seeking enforcement action via FMEP for the same.

Finally, in recent text messages to our client, screenshots of which are **enclosed**, you have sent our client a link to a blog published by you, stating that "that's for us, and the kids when they get old enough to comprehend". We note that your blog includes an article titled "A Criminal Surprise?" which references our client's protection order against you and states that our client "forced" the children to take two doses of the COVID vaccine. This is defamatory and you are to cease and desist any further public statements about our client and the children.

Yours truly,

**Lindsay Kenney LLP**

  
Per.  
Fanda Wu  
Lawyer  
Encl.  
cc: client

LINDSAY KENNEY LLP includes law corporations.

LINDSAY KENNEY LLP is a member of Mackrell International, a Premier Network of Independent Legal Firms.

This is **Exhibit E** referred to in the Affidavit #1 of  
M Stody sworn before me at Vancouver,  
British Columbia this 24<sup>th</sup> day of November, 2023

A handwritten signature in black ink, consisting of a large loop followed by a series of smaller, connected strokes, positioned above a horizontal line.

A Commissioner for taking Affidavits for  
British Columbia

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**From:** dnagase <dnagase@protonmail.com>  
**Sent:** Tuesday, September 26, 2023 11:24 PM  
**To:** Li Ma <LMa@lklaw.ca>  
**Subject:** [EXTERNAL] Re: Nagase v. Nagase

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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<https://danielnagase.substack.com/p/canadian-lawyers-how-they-operate>

My bill to you will follow.

Be advised that bills payable by Lindsay Kenney LLP are greater than 90 days overdue. Reply and / or further communication makes and confirms agreement to pay past bills and a per letter charge for my reply to your letter dated September 5th, 2023.

Sent with Proton Mail secure email.

----- Original Message -----

On Tuesday, September 5th, 2023 at 5:19 PM, Li Ma <[LMa@lklaw.ca](mailto:LMa@lklaw.ca)> wrote:

Dear Dr. Nagase,

Please find our letter of today's date and the enclosures.

Regards,



Li Ma Legal Administrative Assistant  
Lindsay Kenney LLP  
1800, 401 West Georgia Street, Vancouver, BC V6B 5A1, Canada  
D 604.235.3951 | T 604.687.1323 | F 604.687.2347

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LINDSAY KENNEY LLP is a member of *Mackrell International*, a Premier Network of Independent Legal Firms.

Our Vancouver office is moving!

As of October 10, 2023, our Vancouver office will be located in Suite 1500 within the same office building as currently. Our new address will be #1500 - 401 West Georgia Street, Vancouver V6B 5A1. Email, website, fax and telephone coordinates will be unchanged.

This is **Exhibit F** referred to in the Affidavit #1 of  
M Stody sworn before me at Vancouver,  
British Columbia this 24<sup>th</sup> day of November, 2023



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A Commissioner for taking Affidavits for  
British Columbia

#0006019

APRIL 17, 2023.

To: Lindsay Kenney LLP AND Fanda Wu  
1800, 401 West Georgia Street  
Vancouver, BC, Canada  
V6B 5A1  
fwu@lklaw.ca  
FILE: 20183115  
604.235.3950

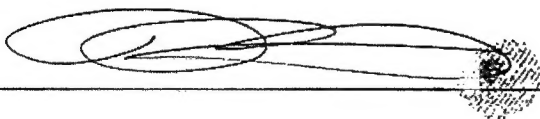
From:  
daniel nagase MD  
all rights reserved.  
6480 Gala St.  
Oliver, B.C.  
V0H 1T0

FOR THE WRONG OF HERESAY AND DEFAMATION RESULTING IN UNWARRANTED  
COURT ORDER AGAINST daniel nagase MD, CAUSING MEDICALLY DANGEROUS  
GUARDIANSHIP OF MY CHILDREN miles tomio nagase AND sophia dawn nagase AT THE  
HANDS OF A REGISTERED NURSE RESULTING IN EGREGIOUS HARM FROM MEDICAL  
EXPERIMENTATION BY ADVERSE PARTY WITH INJECTION OF GENOTOXIC MATTER, I  
CHARGE Lindsay Kenney LLP, L.KI.AW, LKLaw, Fanda Wu AND fanda wu COLLECTIVELY:

\$66,000,000.00 FOR miles tomio nagase BORN JULY 6, 2014  
\$66,000,000.00 FOR sophia dawn nagase BORN MARC 1 26, 2012

TOTALING:

\$132,000,000.00

A handwritten signature in black ink, appearing to read 'Daniel Nagase', is written over a horizontal line. The signature is stylized with loops and a circular flourish at the end.

Invoice for payment without chargeback.  
Invoice for payment without return.